

ALLACCESS LAW GROUP
Irene Karbelashvili, SBN 232223
irene@allaccesslawgroup.com
Irakli Karbelashvili, SBN 302971
irakli@allaccesslawgroup.com
1400 Coleman Ave Ste F28
Santa Clara, CA 95050
Telephone: (408) 295-0137
Facsimile: (408) 295-0142

Attorneys for JAMES PEARSON, Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JAMES PEARSON,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITALS, et
al.

Defendants.

Case No. 2:20-cv-02335-MCE-KJN

**STIPULATION REGARDING FACT
DISCOVERY DEADLINE; ORDER**

Plaintiff JAMES PEARSON (“Plaintiff”) and Defendants KAISER FOUNDATION HOSPITALS, THE PERMANENTE MEDICAL GROUP, INC. (“Kaiser”) and COMMONSPIRIT HEALTH (“Commonspirit”) (collectively, “Defendants”) stipulate, through their undersigned counsel, that the deadline to complete the deposition of Kaiser’s Person Most Qualified witness in response to plaintiff’s May 31, 2022, deposition notice be continued from **June 10, 2022, to July 29, 2022**. The parties believe that good cause exists based on the following:

1 1. On May 18, 2022, Plaintiff filed a motion requesting a continuance of the fact
2 discovery deadline so that he can depose Kaiser's 30(b)(6) witness.

3 2. On May 31, 2022, the Court granted Plaintiff's request and continued the fact
4 discovery deadline to June 10, 2022. ECF No. 27.

5 3. On May 31, 2022, Plaintiff noticed a 30(b)(6) deposition to occur remotely on June 10,
6 2022.

7 4. On June 7, 2022, Kaiser objected to the deposition on the grounds that the witness is
8 not available on June 10, 2022.

9 5. The parties have met and conferred. Kaiser's counsel has agreed to produce the witness
10 for the deposition within the next month in response to the deposition notice served on May 31,
11 2022. Kaiser's counsel currently has a trial scheduled in another matter to begin on June 20 and
12 is unavailable over the next several weeks.

13 6. Based on the foregoing, the parties request that the fact discovery deadline be
14 continued to July 29, 2022 for the sole purpose of holding the deposition 30(b)(6) deposition.

15 7. The parties do not seek a modification of any other deadlines, including but not limited
16 to the December 12, 2022, deadline to file dispositive motions based off the previous extension
17 of fact discovery.

18 Respectfully submitted,

19 Dated: June 13, 2022

20 /s/ Irakli Karbelashvili
21 By Irakli Karbelashvili, Attorney
for Plaintiff JAMES PEARSON

22 Dated: June 13, 2022

23 /s/ Ondrej Likar
24 By Ondrej Likar, Attorney
for Defendants KAISER FOUNDATION
25 HOSPITALS; THE PERMANENTE MEDICAL
GROUP, INC

26 Dated: June 13, 2022

27 /s/ Elizabeth B. Stallard
28 By Elizabeth B. Stallard, Attorney
for Defendant COMMONSPIRIT HEALTH, a
Colorado corporation, d/b/a ST. JOSEPH'S
BEHAVIORAL HEALTH

ORDER

Having reviewed the Parties' stipulation, and good cause appearing, the deadline to complete fact discovery is hereby continued to July 29, 2022, solely to conduct the remaining deposition addressed by Plaintiff's May 31, 2022, deposition notice. The deadline to file dispositive motions remains December 12, 2022. This Order does not modify any other deadlines.

IT IS SO ORDERED.

Dated: June 30, 2022



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE